

STATE OF WYOMING       )  
                                      ) ss.  
COUNTY OF SHERIDAN    )

**EXHIBIT**  
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AFFIDAVIT OF MARK PIERCE, ESQ.

I, Mark Pierce, being at least eighteen years of age and after being duly sworn, state as follows:

1. I am an attorney licensed to practice in the State of Wyoming.
2. I am the managing member of Cloud Peak Law Group, P.C., which is a professional corporation duly licensed and authorized to do business in the State of Wyoming.
3. Cloud Peak Law Group, P.C. has provided legal services to 1<sup>st</sup> International LLC since 2019.
4. On or about July 13, 2022, Cloud Peak Law Group, P.C., received a Summons from the Internal Revenue Service as referred to in Petitioner's Petition to Quash Summons in as Exhibit 1.
5. The Summons refers its recipient to an attachment for a description of the information and/or documents the Internal Revenue Service directs Cloud Peak Law Group, P.C. to produce, but there is no attachment to the Summons.
6. Any information that Cloud Peak Law Group, P.C. would possess would be in the form of attorney-client privilege. Cloud Peak Law Group P.C. does not possess a release from 1<sup>st</sup> International LLC to release any information to anyone, including the Internal Revenue Service.

7. Any release of any information by Cloud Peak Law Group, P.C. with the exception of what may be found on the Wyoming Secretary of State's website would be a violation of 1<sup>st</sup> International LLC's attorney-client privilege.
8. Requiring Cloud Peak Law Group, P.C. to appear before the Internal Revenue Service located approximately 1800 miles from Cloud Peak Law Group's office is further unduly burdensome and unreasonable.

FURTHER, AFFIANT SAYETH NAUGHT.

  
\_\_\_\_\_  
Mark Pierce, Affiant

STATE OF WYOMING     )  
                                      ) ss.  
COUNTY OF SHERIDAN    )

Before me, a Notary Public, appeared Mark Pierce, known to me to be the Affiant in the foregoing document and who, after being duly sworn, this 26 day of July, 2022, states the averments contained herein are true and correct to his best knowledge and belief.

  
\_\_\_\_\_  
Notary Public

My commission expires:

